

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** 09 - 15

v. : **DATE FILED:** January 13, 2009

ROBERTO ARCE, JR. : **VIOLATIONS:**

- : **21 U.S.C. § 841(a)(1) (distribution of 500 grams or more of cocaine - 1 count)**
- : **21 U.S.C. § 860 (distribution of 500 grams or more of cocaine within 1000 feet of a school - 1 count)**
- : **21 U.S.C. § 841(a)(1) (possession with intent to distribute 500 grams or more of cocaine - 1 count)**
- : **21 U.S.C. § 860 (possession with intent to distribute 500 grams or more of cocaine within 1000 feet of a school - 1 count)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 30, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

ROBERTO ARCE, JR.

knowingly and intentionally distributed 500 grams or more, that is, approximately 1,014 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

ROBERTO ARCE, JR.

knowingly and intentionally distributed 500 grams or more, that is, approximately 1,014 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising Mastbaum Technical High School, a public high school located at 3116 Frankford Avenue, in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

ROBERTO ARCE, JR.

knowingly and intentionally possessed with intent to distribute 500 grams or more, that is, approximately 2,006 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2008, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

ROBERTO ARCE, JR.

knowingly and intentionally possessed with intent to distribute 500 grams or more, that is, approximately 2,006 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising Mastbaum Technical High School, a public high school located at 3116 Frankford Avenue, in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860.

A TRUE BILL:

FOREPERSON

LAURIE MAGID
Acting United States Attorney